Gina Harrison
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PACIFIC TELESIS
Group-Washington

October 10, 1995

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William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 92-297 - Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5 - 29.5 GHz Frequency Band, to Reallocate the 29.5 - 30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*

On behalf of Pacific Telesis Wireless Broadband Services, please find enclosed an original and six copies of its *"Reply Comments"* in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5 - 29.5 GHz Frequency Band, to Reallocate the 29.5 - 30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services	)	CC Docket No. 92-297

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REPLY COMMENTS OF PACIFIC TELESIS WIRELESS BROADBAND SERVICES

Pacific Telesis Wireless Broadband Services ("PTWBS") hereby files reply comments on the Third Notice of Proposed Rulemaking and Supplemental Tentative Decision in the above named matter.

Public Television, Rio Vision of Texas, Inc., and the law firm of Duncan, Weinberg, Miller & Pembroke, P.C. have commented that various portions of the spectrum designated for LMDS should be set aside for non-commercial/educational use. These requests range from a specific band (29.0 - 29.25 GHz) to a percentage of the spectrum obtained at auction. We appreciate the need for the request, but many comments have pointed out, 1 GHz of band width is needed for a commercially viable LMDS service.

Alcatel Network systems, Harris Farinon, Digital Microwave Corp., and Telecommunications Industry Association advocate a co-primary allocation of the LMDS spectrum to point-to-point microwave service. We advocate use of point-to-point microwave within a service area at the discretion of the auction winner as a means of using excess capacity on a non-interfering basis.

On the use of subscriber transmitters on 29.1 - 29.25 GHz (proposed section 21.1019), we believe that with the 1 GHz of LMDS spectrum being split, the use of

subscriber transmitters in this band is a necessity. We realize that mitigation of FSS feeder link potential interference must be a requirement of this use of this 150 MHz.

Many of the satellite entities (NASA, Lockheed Martin, GE Americom, PanAmSat, etc.) commented supporting the prohibition or extremely limited use of the 28 GHz band for LMDS. We strongly oppose this position. The arguments regarding availability of production equipment at 40 GHz and the lack of equipment available to meet build-out requirements at 28 GHz are not consistent with our millimeter wave experience. As an example, a TWT for use at over 28 GHz at commercial prices is not now available except for experimental units with the normal problems of experimental equipment (design flaws, poor life expectancy, etc.)

Regarding the imposition of restrictions on ownership of LMDS licenses, the auction and build-out requirements will insure that licenses do not go unused. We favor no restrictions on LMDS ownership. We think that a choice of technologies for serving customers will insure a least cost solution and will result in lower costs to the users. The choice of cable, fiber, MMDS, satellite or LMDS facilities for service provision should be based on area geography, demographics, foliage, population density and economics, etc. The proposal for Designated Entities adequately addresses the issue of how smaller businesses may participate in the auction process.

The issue of power limitations to -52 dBW/Hz is discussed by Engate and Hewlett Packard. We agree that this should be increased as interference considerations permit. We favor an increase to -30 dBW/Hz, as proposed by Hewlett Packard, or greater, possibly up to the originally proposed -18 dBW/Hz if detailed analysis shows no interference penalty.

Andrew Corporation has proposed that LMDS proponents, satellite proponents and the Commission reevaluate the feasibility of sharing the 28 GHz spectrum based on the improved capabilities of the new prototype SHX-10 type antenna. We think that the antenna does provide additional sidelobe suppression, as noted in the Bellcore proposal. This antenna could be acceptable to some satellite and LMDS proponents. The need for

mechanical steerability precludes its use in satellite systems requiring rapid antenna re-pointing, e.g., Teledesic. The antenna should be considered in system designs, but the Commission should not consider an additional period of negotiations and evaluation. The present rulemaking is progressing at a rate so as to provide actual service within a reasonable time period.

Respectfully submitted,

PACIFIC TELESIS WIRELESS
BROADBAND SERVICES

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Dated: October 10, 1995